OBSERVATION REPORT #104

Verizon does not meet System Outages notification timeliness established in the Verizon Change Control Notification Process.

Issue

The Verizon CLEC Change Management Notification Process includes the following process flow for System Outages:

- If the System Outage, Severity 1, is not resolved within 20 minutes then a notification will be sent out to the CLECs via email. A Severity 1 relates to connectivity problems.
- If the System Outage, Severity 2, is not resolved within 1 hour then a notification will be sent out to the CLECs via email. A Severity 2 relates to transaction problems.

KPMG Consulting reviewed 166 System Outages starting March 1, 2000 through February 28, 2001. In this review, KPMG Consulting used the information taken directly from the email notification attachments sent by Verizon, the date/time stamps associated with each email, and Verizon's Change Management Notification Process document. According to Verizon's procedures, the interval time begins upon identification of the issue. Verizon does not meet these intervals in a reasonable percentage based on the issue identification time.

KPMG Consulting reviewed the intervals of time for system outages in two ways. The first was to look at the time difference between identification of the problem and the time officially recorded as the notification time within the bulletin (this is Verizon's record of the problem). The second was to compare the identification time to the actual date/time stamp recorded on the email sent to the CLECs (i.e., another record of the actual interval experienced by CLECs). Based on the interval as measured under both scenarios, KPMG Consulting found that Verizon did not consistently meet the interval policy.

For Table 1, KPMG Consulting used the "Initial" bulletins, which were attached to the emails sent to CLECs by Verizon's WCCC (Wholesale Customer Care Center). KPMG Consulting compared the interval between the Date and Time Issued Identified to the Date and Time of bulletin. This difference was compared to the expected intervals for each severity level and recorded appropriately. However, several System Outages (29 of 166) were not able to be compared due to the status of the bulletin, missing information, or documented times did not allow for such calculations. Table 1 below displays all System Outages that did not meet the specified intervals or did not have adequate information for the period beginning October 1, 2000 and ending February 28, 2001.

Table 1: Initial Bulletin – Difference in Time between Identification and Notification

Date of System Outage Occurrence	System Outage Number	Assigned Severity Level	Time Difference Between Initial Bulletin Identification and Initial Bulletin Notification	Met Interval?
10/04/2000	85820	1	1:20	No
10/05/2000	87298	1	0:25	No
10/06/2000	88249	1	0:25	No
11/03/2000	109513	2	Not Available	N/A
11/06/2000	111725	1	0:27	No
10/25/2000	101237	1	Not Available	N/A
10/18/2000	97624	1	0:25	No
11/27/2000	126236	1	Not Available	N/A
11/29/2000	131081	1	Not Available	N/A
12/04/2000	132229	2	Not Available	N/A
02/14/2001	188378	2	Not Available	N/A
02/19/2001	191699	2	2:21	No
02/27/2001	198981	1	0:40	No

Summary of System Outage Notifications March 1, 2000 – February 28, 2001		
	Total Number Met ("Yes")	91
	Total Number Not Met ("No")	46
	Total Number of Notices Reviewed	137

The overall compliance rate for System Outage Notifications using these criteria was approximately 66% (91 of 137). Of the notifications that were sent past the specified period, they were late by an average of approximately 16 minutes.

For Table 2, KPMG Consulting used the "Initial" bulletins, which were attached to the emails sent to the CLECs by Verizon's WCCC. KPMG Consulting compared the interval between the Date and Time Issue Identified that was listed in the Initial Bulletin to the Date Stamp on the email sent by Verizon WCCC. Bulletins that did not meet the specified intervals were labeled as "No" on the table. A number of System Outages (28 of 166) were not able to be compared due to the status of the bulletin, the lack of certain information, or the documented times did not allow for calculations to be performed. Table 2 illustrate a sample of results for October 1, 2000 through February 28, 2001, for System Outages that did not meet the intervals or for which the analysis could not be performed.

The results using the second set of criteria show a lower overall compliance rate.

Table 2: Date Stamp Difference in Time between Email Date Stamp and Issue Identification

Date of System Outage Occurrence	System Outage Number	Assigned Severity Level	Time Difference Between Email Sent Time and Issue Identified Time	Met Interval?
10/04/2000	85820	1	1:37	No
10/05/2000	87298	1	0:27	No
10/06/2000	88249	1	0:34	No
10/14/2000	94424	1	0:23	No
11/01/2000	108532	1	0:25	No
11/03/2000	109513	2	Not Available	N/A
11/06/2000	111725	1	0:29	No
10/25/2000	101237	1	Not Available	N/A
10/25/2000	102497	1	Not Available	N/A
10/18/2000	97678	1	Not Available	N/A
10/18/2000	97624	1	Not Available	N/A
10/17/2000	96278	2	Not Available	N/A
11/27/2000	126236	1	Not Available	N/A
11/28/2000	126950	1	0:25	No
11/29/2000	131081	1	Not Available	N/A
02/14/2001	188378	2	Not Available	N/A
02/22/2001	194865	2	1:01	No
02/27/2001	198981	1	0:45	No

Summary of System Outage Notifications			
March 1, 2000 – February 28, 2001			
	Total Number Met ("Yes")	53	
	Total Number Not Met ("No")	85	
	Total Number of Notices Reviewed	138	

The overall compliance rate for System Outage Notifications using the Time Sent criteria for calculation of the interval was 39% (53 of 138). Of the notifications that were sent past the specified period, the communications to CLECs were late by an average of approximately 28 minutes.

Assessment

Verizon is not sending out notification within the interval time established by the Change Management Notification Process. Table 1 indicates that, Verizon met the intervals 66%

of the time. Table 2 indicates that Verizon met the intervals 39% of the time. CLECs may be unaware of system outages and their severity – impeding CLEC operations.

Verizon Response:

Verizon does not agree with KPMG's overall findings as outlined in NJ Observation 104. A major contributor to that disagreement is the KPMG understanding of the Change Management Process as it pertains to the notification process for system outages.

The following is information taken from the February 2000 CLEC Change Management Notification Process document.

Definition:

The System Outage notification process will be used to communicate the following:

- 1. A VZ system outage has occurred that prevents **connectivity**, rendering the CLECs unable to connect to VZ through one of the production interfaces. (Web GUI, CORBA, EDI)
- 2. A VZ system outage has occurred that prevents the CLEC from performing **transactions** for Ordering, Pre-order or trouble maintenance through any of the production interfaces. (Web GUI, CORBA, EDI).

Initial Industry Notification occurs within 20 minutes of identification of the system outage when the issue is related to connectivity; OR within 1 hour of identification of the system outage when the issue is related to performing transaction.

Per the Change Management Notification Process, severity levels are not assigned to system outage notices. VZ is unsure of the significance of this with respect to the observation but feel it may be leading to some of the misunderstanding on the part of KPMG.

VZ Response Table 1.

Outage 85820: This is a "transaction" outage and the 1-hour notification interval is required for this outage. VZ did not meet the requirement in this instance but was late by 20 minutes not 1 hour and 20 minutes. Issue identified at 6AM and the notification was sent at 7:20 AM.

Outage 87298: This was a slow response trouble not a system outage. Initial industry notification must be sent out within 1 hour according to the Change Management Notification Process documentation. VZ did meet the 1-hour requirement for sending this notice. Issue Identified at 11:20 AM and the notice was issued at 11:45 AM.

Outage 88249: This is a "connectivity" outage and the 20-minute notification interval is required for this outage. VZ did not meet the requirement in this instance but was late by 5 minutes not 25 minutes. Issue identified at 12:50 PM and the notification was sent at 1:15 PM.

Outage 109513: This is a "transaction" outage and the 1-hour notification interval is required for this outage. VZ did meet the requirement for notification in this instance. Issue identified at 3:41 PM and the notification was sent at 4:00 PM

Outage 111725: This is a "connectivity" outage and the 20-minute notification interval is required for this outage. VZ did meet the requirement in this instance. Issue identified at 12:10 PM and the notification was sent at 12:30 PM. (The bulletin initially stated the outage was identified at 12:03 PM, which may explain KPMG's finding.) That was updated and the correct time was reported for the monthly metrics output.

Outage 101237: This was a slow response trouble not a system outage. Initial industry notification must be sent out within 1 hour according to the Change Management Notification Process documentation. VZ did meet the 1-hour requirement for sending this notice. Issue Identified at 1:55 PM and the notice was issued at 2:52 PM.

Outage 97624: This is a "connectivity" outage and the 20-minute notification interval is required for this outage. VZ did meet the requirement in this instance. Issue identified at 9:36 AM and the notification was sent at 9:40 AM.

Outage 126236: This was a slow response trouble not a system outage. Initial industry notification must be sent out within 1 hour according to the Change Management Notification Process documentation. VZ did meet the 1-hour requirement for sending this notice. Issue Identified at 12:46 PM and the notice was issued at 1 PM.

Outage 131081: This is a "connectivity" outage and the 20-minute notification interval is required for this outage. VZ did meet the requirement in this instance. Issue identified at 9:15 AM and the notification was sent at 9:20 AM.

Outage 132229: This is a "transaction" outage and the 1-hour notification interval is required for this outage. VZ did meet the requirement for notification in this instance. Issue identified at 4:45 PM and the notification was sent at 5:32 PM.

Outage 188378: This is a "transaction" outage and the 1-hour notification interval is required for this outage. VZ did meet the requirement for notification in this instance. Issue identified at 7:40 PM and the notification was sent at 8:35 PM.

Outage 191699: This was a slow response trouble not a system outage. Initial industry notification must be sent out within 1 hour according to the Change Management Notification Process documentation. VZ did meet the 1-hour requirement for sending this notice. Issue Identified at 12:46 PM and the notice was issued at 1 PM.

Outage 198981: This was a slow response trouble not a system outage. Initial industry notification must be sent out within 1 hour according to the Change Management Notification Process documentation. VZ did meet the 1-hour requirement for sending this notice. Issue Identified at 11:25AM and the notice was issued at 12:05 PM.

VZ response for Table 2

After reviewing the additional notifications in Table 2, Verizon disagrees with the KPMG position that these notifiers were late. In all the additional notifications looked at Verizon met either the 20-minute or the 1-hour notification time frame. Verizon believes KPMG's understanding of the Change Management Process as it pertains to the notification process for system outages may contribute to this difference.

Verizon uses Lotus Notes to issue the system outage and slow response bulletins to the CLECs. At the current time Verizon maintains seven individual mailing lists (3 internal lists and 4 external lists). Verizon sends the notifications to the external list first and then to the internal Verizon list.

Verizon does not agree with the time frames as outlined by KPMG in Table 2. (Since Table 2 is based primarily on Table 1) Verizon contends the bulletins are created within the required time frames and the mailing also begins within the required time frames. But it is possible that due to email system processing there may be occasions when individuals on the mailing lists may not receive the notice within the specified time.